



**U.S. Department of Justice**

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October 16, 2023

**VIA:CM/ECF System**

Honorable Richard J. Arcara  
United States District Court  
2 Niagara Square  
Buffalo, NY 14202

Re: U.S. v. Robert Calkins, 22-CR-133-A

Dear Judge Arcara:

This letter is intended to supplement the government's Memorandum in Support of Victim Restitution (Dkt. 53). It is intended to both clarify the government's representations regarding the images and videos that the defendant possessed, as well as to provide the Court with information received after the government's submission.

First, in its Memorandum, the government provided the gross number of images and/or videos possessed by the defendant with respect to each victim, but it did not delineate whether the images possessed were videos or still images. The following information is based on the government's interpretation of the Child Identification Report ("CIR") provided by the National Center for Missing and Exploited Children.

1. Pia—Sweet White Sugar Series:
  - a. Based on file names in the CIR, it appears that all six images possessed by the defendant are still images.
2. Mya—Sweet Pink Sugar Series:
  - a. Based on file names in the CIR, it appears that the two images possessed by the defendant are both still images.
3. Jen—JBNFlowers1 Series:
  - a. Based on file names in the CIR, it appears that the single image possessed by the defendant is a still image.
4. Ivy—JBNFlowers2 Series:
  - a. Based on file names in the CIR, it appears that the single image possessed by the defendant is a still image.

5. April—Aprilblonde Series:
  - a. Based on file names in the CIR, it appears that all twenty-nine images possessed by the defendant are still images.
6. Maria—Best Necklace Series:
  - a. Based on file names in the CIR, it appears that, of the sixteen files possessed by the defendant, 15 are still images and 1 is a video.
7. Henley—BluePillow1 Series:
  - a. Based on file names in the CIR, it appears that all thirteen images possessed by the defendant are still images.
8. Jane—Cinderblock Blue Series:
  - a. Based on file names in the CIR, it appears that all eight images possessed by the defendant are still images.
9. Jenny—Jenny Series:
  - a. Based on file names in the CIR, it appears that of the three images possessed by the defendant, two are still images, and one is a video.
10. Lily—Vicki Series:
  - a. Based on file names in the CIR, it appears that of the five images possessed by the defendant, four are still images, and one is a video.

In addition to the information above, the government has received the following additional information from attorneys for the victims:

1. To date, “Pia” has received \$832,556.97 in restitution from other defendants;
2. To date, “Mya” has received \$294,854.68 in restitution from other defendants; and
3. To date, “Henley” has received \$384,503.03 in restitution from other defendants.

Very truly yours,

TRINI E. ROSS  
United States Attorney

BY: s/DAVID J. RUDROFF  
Assistant United States Attorney

DJR/swb

cc/ James Riotto, Esq.  
via: cm/ecf System